

NATAGE RUTHERFORD@fine. on be 12:102612-11.08437.404

To:

oppt.ncic@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA

cc:

Richard Hefter/DC/USEPA/US@EPA

Subject: HPV Challenge Program, AR-201- Registration Number:

Resending with subject line.

---- Forwarded by NATALIE RUTHERFORD/APG/PHILA/FMC/US on 12/30/2002 11:26 AM -----

NATALIE RUTHERFORD

To: oppt.ncic@epa.gov, chem.rtk@epa.gov

12/30/2002 11:24 AM

hefter.richard@epa.gov, (bcc: NATALIE RUTHERFORD/APG/PHILA/FMC/US) CC:

Subject:

FMC Corporation actively supports the EPA HPV Challenge Program and is pleased to submit the cover letter, proposed test plans and robust summaries for the two chemicals sponsored for the year 2002:

Methyl 3,3-dimethyl-4, pentenoate - - CAS No. 63721-05-1

Methyl 4,6,6,6-tetrachloro-3,3-dimethylhexanoate - - CAS No. 64667-33-0

Please contact me if you have comments or questions regarding this submission.

Natalie Rutherford Global Regulatory Manager **FMC** Corporation

215-299-6680 DVE Step I & II Cover Letter.doc DVE Step I Test Plan 12-30.doc

DVE Step I Summaries 12-30.doc DVE Step II Test Plan 12-30.doc DVE Step II Summaries 12-30.doc

December 30, 2002

Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

Registration Number:

Dear Administrator Whitman:

FMC Corporation actively supports the EPA HPV Challenge Program, AR-201 and is pleased to submit the proposed test plans and robust summaries for the two chemicals sponsored for the year 2002:

- Methyl 3,3-dimethyl-4, pentenoate - CAS No. 63721-05-1
- Methyl 4,6,6,6-tetrachloro-3,3-dimethylhexanoate - CAS No. 64667-33-0

FMC proposes Closed System Intermediate Status for both chemicals and information supporting exemption claims for Reduced SIDS Testing has been included in the robust summaries.

FMC understands there will be a 120-day review period for the test plan and that all comments received by EPA will be forwarded to FMC for consideration. Please contact me if you have comments or questions regarding this submission.

Sincerely,

Natalie Rutherford Global Regulatory Manager FMC Corporation Tel. 215.299.6680 Fax 215.299.6468 2002 DEC 30 PH 4: 1: